

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

In re: Vicky Rodríguez-Torres  
Debtor

Vicky Rodríguez-Torres  
Plaintiff

v.

Enid López-López  
Guillermo Camba-Casas  
Mariela Rexach-Rexach  
Government Development Bank PR, et al.  
Defendants

09-10864-BKT7  
Chapter 7

ADVERSARY PROCEEDING  
10-00137-BKT

18 U.S.C. § 1030,  
18 U.S.C. § 2510,  
18 U.S.C. § 2701,  
42 U.S.C. § 1983,  
42 U.S.C. § 1985,  
42 U.S.C. § 1988,  
TORTS

DESIGNATION OF RECORD ON APPEAL  
AND  
STATEMENT OF ISSUES TO BE PRESENTED

TO THE HONORABLE COURT:

Now comes Debtor and here Plaintiff and Appellant, Vicky Rodríguez-Torres through the undersigned attorney, pursuant to **Fed. R. Bankr. P. 8006**, and designates the following contents for inclusion in the record on appeal:

1. *Complaint* filed on August 9<sup>th</sup>, 2010, by VICKY RODRIGUEZ TORRES; **ECF No. 1.**
2. *Motion to Dismiss Adversary Proceeding*, filed on September 21<sup>st</sup>, 2010, by GOVERNMENT DEVELOPMENT BANK OF P.R., MARIELA REXACH REXACH; **ECF No. 11.**
3. *Opposition to MOTION TO DISMISS* filed on November 1<sup>st</sup>, 2010, by VICKY RODRIGUEZ TORRES; **ECF No. 48.**

**4. Reply to Plaintiff's Opposition to Motion to Dismiss** filed on November 18<sup>th</sup>, 2010, by GOVERNMENT DEVELOPMENT BANK OF P.R., MARIELA REXACH REXACH; **ECF No. 56.**

**5. OPINION AND ORDER granting Motion to Dismiss** filed on January 28<sup>th</sup>, 2011; **ECF No. 66.**

Appellant VICKY RODRIGUEZ TORRES further states that the following issues will be presented on appeal:

**1. Fed. R. Civ. P. 12(b)(6)** requires analysis of the legal sufficiency of the complaint.

**2. Fed. R. Civ. P. 12(b)(6)** requires court to assume that Appellant's factual allegations are true in determining sufficiency of the complaint.

**3. Fed. R. Civ. P. 12(b)(6)** precludes court from disregarding Appellant's factual merits of the case.

**4. Fed. R. Civ. P. 12(b)(6)** precludes court from determining that Appellee's factual allegations are true.

Submitted in New York, New York, this 10<sup>th</sup> day of February, 2011.

S/William E. Meléndez Menéndez

**William E. Meléndez Menéndez**

USDC PR No. 226902

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system

which will send notification of such filing to all parties in interest.

In New York, New York, this 10<sup>th</sup> day of February, 2011.

S/William E. Meléndez Menéndez

William E. Meléndez Menéndez

USDC PR No. 226902